

Fill in this information to identify the case:

Debtor 1 John C. Kuhn

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania  
(State)

Case number 5:18-bk-05394-MJC

Form 4100R

## Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: U.S. Bank Trust National Association as Trustee of the Cabana Series IV Trust Court claim no. (if known): 10-1

Last 4 digits of any number you use to identify the debtor's account: 5555

Property address: 4107 Winona Dr  
Number Street

Pocono Lake PA 18347  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

### Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 01 / 01 / 2024  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

     /      /       
MM / DD / YYYY

Debtor 1 John C. Kuhn  
First Name Middle Name Last Name

Case number (if known) 5:18-bk-05394-MJC

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

☒ /s/ Lauren Moyer  
Signature

Date 01 / 12 / 2024

Print Lauren Moyer  
First Name Middle Name Last Name

Title \_\_\_\_\_

Company Friedman Vartolo LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address 1325 Franklin Avenue, Suite 160  
Number Street

Garden City NY 11530  
City State Z P Code

Contact phone (212) 471 - 5100

Email bankruptcy@friedmanvartolo.com

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

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IN RE:	:	CASE NO.: 18-05394-MJC
	:	
John C. Kuhn,	:	CHAPTER: 13
	:	
<i>Debtor(s)</i>	:	HON. JUDGE.: Mark J Conway
	:	

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**CERTIFICATE OF SERVICE**

On January 12, 2024, I, Lauren M. Moyer, Esq, caused to be served a true copy of the annexed **RESPONSE TO NOTICE OF FINAL CURE PAYMENT** by mailing the same by First Class Mail in a sealed envelope, with postage prepaid thereon, in a post office or official depository of the U.S. Postal Service addressed to the last known address of the addressee, and the property address as indicated on the attached Service List annexed hereto.

By: /s/ Lauren M. Moyer, Esq  
FRIEDMAN VARTOLO LLP  
1325 Franklin Avenue, Suite 160  
Garden City, New York 11530  
T: (212) 471-5100  
F: (212) 471-5150

**SERVICE LIST**

**JOHN C. KUHN**

P.O. Box 315

Pocono Lake, PA 18347

**TIMOTHY B. FISHER, II**

*FISHER AND FISHER LAW OFFICES*

PO Box 396

525 Main Street

Gouldsboro, PA 18424

*Debtor's Attorney*

**JACK N ZAHAROPOULOS**

8125 Adams Drive, Suite A

Hummelstown, PA 17036

*Trustee*

**UNITED STATES TRUSTEE**

US Courthouse

1501 N. 6th St

Harrisburg, PA 17102

*U.S. Trustee*